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11 *Attorneys for Plaintiff*

12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF NEVADA

14 DONNA CARLSON, an individual;  
15  
16 Plaintiff,

17 vs.

18 SAM'S WEST, INC., a Foreign Corporation  
doing business as SAM'S CLUB, and also doing  
19 business as SAM'S CLUB #6382; SAM'S REAL  
ESTATE BUSINESS TRUST; DOES I through  
20 X; and ROE CORPORATIONS I through X,  
21 inclusive,

22 Defendants.  
23

Case No.: 2:17-cv-02882-MMD-GWF

**STIPULATION AND PROPOSED ORDER**  
**TO FILE OPPOSITION TO**  
**DEFENDANTS' SECOND MOTION FOR**  
**PROTECTIVE ORDER**

**FIRST REQUEST**

24 Plaintiff DONNA CARLSON ("Plaintiff") and Defendants SAM'S WEST, INC. and  
25 SAM'S REAL ESTATE BUSINESS TRUST ("Defendants") by and through their respective  
26 counsel of record, do hereby stipulate for an extension of time for Plaintiff to respond to  
27 *Defendant Sam's West, Inc's Second Motion for Protective Order Precluding Inappropriate*  
28

1 *Areas of Fed.R.Civ.P. 30(b)(6) Examination* (Document No. 93) ("MPO")), up to and including  
2 April 26, 2019.

3  
4 Pursuant to Local Rule 2.25, the parties hereby aver that this is the first request for such  
5 extension of time to respond to the MPO.

6 The parties aver, pursuant to Local Rule 2.25, that good cause exists for the requested  
7 extension.  
8

9 The parties aver that this request for extension of time to respond to the MPO is made in  
10 good faith and not for the purpose of delay.

11 Dated this 19<sup>th</sup> day of April, 2019.

12 SGRO & ROGER

PHILLIPS, SPALLAS & ANGSTADT LLC

13  
14 /s/ Anthony P. Sgro, Esq.  
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*Attorneys for Defendants*

21  
22 *Attorneys for Plaintiff*

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24 **IT IS SO ORDERED**

25   
26 **UNITED STATES MAGISTRATE JUDGE**

27 **DATED:** April 23, 2019  
28